

SEP 12 2018
U.S. DISTRICT COURT
EASTERN DISTRICT OF MO
ST. LOUIS

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MISTI MORRIS,

Defendant.

4:18CR762 RWS/NCC

THE GRAND JURY CHARGES:

At all times relevant to this Indictment:

General Allegations

1. The Social Security Administration ("SSA") was an agency of the United States, which created the Old-Age, Survivors, and Disability Insurance Program, pursuant to Title II of the Social Security Act codified at Title 42, United States Code, Sections 401, et seq. The Social Security Disability Insurance Program provided monthly benefit payments to beneficiaries designed to replace, in part, the loss of income due to a disability.
2. On or about September 28, 2007, defendant MISTI MORRIS applied to receive Social Security Disability Insurance Benefits ("disability benefits") by protectively filing an application with SSA. MORRIS was awarded monthly disability benefits, to be paid to MORRIS, with a disability start date of December 24, 2005.

3. For the following time periods, MORRIS worked as a bail bondsman and received income from that work.

INDICTMENT

COUNT ONE

The Grand Jury charges that:

On or about April 8, 2016, within the Eastern District of Missouri, the defendant,

MISTI MORRIS,

in a matter within the jurisdiction of the Social Security Administration, a department of the United States, did knowingly and willfully make and cause to be made a false, fictitious, and fraudulent statement and representation as to a material fact and did make and use and cause to be made and used a false document, knowing the same to contain a materially false, fictitious and fraudulent statement, in that, in a document entitled "Continuing Disability Review Report," did state and represent and cause to be stated and represented that she had not worked since the date of her last medical disability decision, and as defendant **MISTI MORRIS** well knew, she had been regularly working and earning income as a bail bondsman in 2015 and 2016.

In violation of Title 18, United States Code, Section 1001(a).

COUNT TWO

The Grand Jury further charges:

On or about July 1, 2016, within the Eastern District of Missouri, the defendant,

MISTI MORRIS,

did embezzle, steal, purloin, or knowingly convert to her use, and the use of others, money of the United States or of any department or agency thereof, or any property made or being made under contract for the United States or any department or agency thereof, to wit: \$1,480.00 in the form of Social Security Administration Disability Insurance benefit payments, creating a total loss to the government in excess of \$1,000.00.

In violation of Title 18, United States Code, Section 641.

A TRUE BILL.

FOREPERSON

JEFFREY B. JENSEN,
United States Attorney

DIANE E.H. KLOCKE, #61670MO
Special Assistant United States Attorney